

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	ALEXIS MARIE PETERS	:	CHAPTER 13
	Debtor	:	
		:	
	JACK N. ZAHAROPOULOS	:	
	STANDING CHAPTER 13 TRUSTEE	:	
	Movant	:	
		:	
	ALEXIS MARIE PETERS	:	
	Respondent	:	CASE NO. 1-24-bk-01052

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 14th day of June 2024, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. The Trustee avers that Debtor(s)' Plan is not feasible based upon the following:
 - a. Secured claims not in Plan, specifically, Claim 5.

WHEREFORE, Trustee alleges and avers that Debtor(s) Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 14th day of June 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

PAUL MURPHY-AHLES ESQUIRE
DETHLEFS, PYKOSH & MURPHY
2132 MARKET STREET

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee